

MONICA DANIEL HUTCHISON,

Plaintiff,

vs.

TEXAS COUNTY, MISSOURI;
MICHAEL R. ANDERSON,
TEXAS COUNTY PROSECUTING
ATTORNEY; and
MICHAEL R. ANDERSON, individually

Defendants.

Jury Trial Demanded

Anderson told Monica Daniels Hutchison that she would need to look for a new job. Monica Daniel Hutchison did not return to work after that conversation.

At the beginning of the next week Mr. Anderson asked Sergeant Jeff Kinder, a Missouri Highway Patrolman, to call Ms. Daniel and see if she would talk with Mr. Anderson about returning to her job. She agreed to do so, and, after talking to Mr. Anderson, returned to work at the Prosecuting Attorney's office.

On the early Morning of Sunday, December 18, 2005 Mike Anderson went to the home of Monica Daniel Hutchison. He knocked on the doors and windows and used his cell phone periodically to call her home, leaving messages. Monica Daniels Hutchison was at the house with Mildred Williams, and did not answer the door, nor did she answer to phone calls.

On December 23, 2005, Michael Anderson requested Judge Ellsworth of Texas County to issue a criminal investigative subpoena, which read as follows "For copying, any voice recording audio or otherwise and any telephone answering machine recordings of Michael Anderson taken at your residence on December 18, 2005." Judge Ellsworth signed the subpoena.

After the Judge served the subpoena upon Ms. Daniels Hutchison she resigned her employment.

On May 31, 2006, Mr. Anderson filed a lawsuit against Monica Daniels Hutchison and Mildred Williams alleging that they defamed him. Mr. Anderson dismissed that lawsuit on July 10, 2006.

In this case Plaintiff, Monica Daniels Hutchison, seeks to recover damages from the Defendant, Michael Anderson. She alleges that Michael Anderson discriminated against her during her employment with him because of her sex in violation of her rights under the United States Constitution and Section 1983 of the United States Code. Monica Daniel Hutchison alleges that the lawsuit against her and Mildred Williams was maliciously prosecuted by Defendant. She also

alleges that Michael Anderson filed that lawsuit against her and Mildred Williams and obtained the subpoena for an improper purpose and thereby abused legal process.

Finally, she alleges Mr. Anderson intentionally caused her emotional distress by calling her, coming to her house, and his actions at her house during the early morning of December 18, 2005.

Respectfully Submitted,

STEELMAN, GAUNT & HORSEFIELD

By: /s/ Stephen F. Gaunt
MO Bar #33183
David L. Steelman, MO Bar #27334
901 Pine Street, Ste. 110
P.O. Box 1257
Rolla, MO 65402
Telephone: 573-341-8336
Fax: 573-341-8548
dsteelman@steelmanandgaunt.com
sgaunt@steelmanandgaunt.com

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, Stephen F. Gaunt, hereby certify that on the 25th of March, 2011 the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to:

Warren E. Harris
Taylor, Stafford, Clithero, Fitzgerald & Harris, LLP
3315 East Ridgeview, Ste. 1000
Springfield, MO 65804
Counsel for Defendant Michael Anderson

/s/ Stephen F. Gaunt
Stephen F. Gaunt